



Australian Live Music Business Council

11 July 2025

To Whom It May Concern,

**Submission to the Place of Public Entertainment (POPE) Directions Paper Consultation
Re: Strong Industry Support for Option 3 – Remove POPE Permits**

The Australian Live Music Business Council (ALMBC) is a business Chamber for live music business across the continent – we have well over 2,000 members & 150 financial members representing around 20,000 live music workers. Our Board Members, partners, founding members are some of the biggest and most successful live music businesses in events, venues, festivals, agents, production, security, electrical, transport, and much more.

The ALMBC are writing to express our strong support for Option 3 in the Review of the Place of Public Entertainment (POPE) Framework directions paper: abolishing the POPE framework in full.

The current POPE framework creates unnecessary duplication of existing planning and building approvals, compromising our ability to effectively deliver world-class festival events for Victorians.

CURRENT SYSTEM FAILURES

Replacing the current framework with clear reliance on existing planning and building systems is a proven model working across Australia. This will support festivals to operate efficiently to the high safety standards critical to success.

Festival promoters and organisers are already required to undertake intensive planning permit processes that thoroughly assess amenity, crowd safety, access, infrastructure and

environmental impacts. The additional POPE permit layer, issued through a separate building stream, adds complexity without evidence of improved safety outcomes.

The current dual approval system:

- Confuses roles and responsibilities between councils, regulators and promoters
- Adds cost and delay for government and festivals, especially in regional and rural areas with limited council capacity
- Increases legal and compliance risks, and unacceptable risk for festivals - with some POPEs not issued until hours before gates open of fully sold out festivals.

This leaves Victoria as Australia's only state with this additional red tape layer.

NATIONAL BEST PRACTICE

Victoria now stands alone maintaining a separate POPE permit system. New South Wales abolished POPE permits in 2009, integrating approvals into existing planning and building controls to:

- streamline approval processes by removing regulatory duplication and red tape
- support festivals and cultural events by making compliance easier for operators of all sizes
- maintain safety standards through existing planning, building, liquor licensing and emergency services pathways.

MAINTAINING SAFETY STANDARDS

We strongly support rigorous safety standards with patron satisfaction and safety the heart of a festival. We are not seeking reduced safety standards. Public safety, accessibility and crowd management remain critical and can be effectively achieved through:

- The rigorous planning permit process
- The National Construction Code and new occupancy requirements for temporary structures.
- WorkSafe, emergency services and health compliance (First Aid Services regulation and pill testing).

Adopting Option 3 and abolishing POPE permits entirely will align Victoria with the rest of Australia, reduce unnecessary costs and conflicts between event organisers and regulators, and support the recovery and growth of Victoria's festival sector with genuine and efficient public safety at its core - bringing Victoria's event regulatory system in line with the State's reputation as the most pro-event and the live music capital.

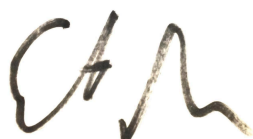
The ALMBC does have some concern regarding the process of removing POPE's, that local governments do not implement their own further complex arrangements, with the potential for over-reach and increased complexity.

Therefore, we encourage the Department to work closely with all local governments in Victoria to find appropriate alignment across all jurisdictions.

Further, the ALMBC will continue to work collaboratively with organisations such as the Australian Festivals Association and Music Victoria to advocate nationally for global best practise and national alignment.

We thank the Department for its engagement on this issue and welcome the opportunity to provide further input and work with you on this important reform.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'AM', with a stylized flourish at the end.

Ant Mckenna
Executive General Manager
Australian Live Music Business Council (ALMBC)
581 Princes Highway
Tempe NSW 2044 AUSTRALIA